

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
ATHENS DIVISION**

GEORGIA RENEWABLE POWER, LLC,
GRP-MADISON, LLC, AND GRP-
FRANKLIN LLC,

Plaintiffs,

vs.

AMEC FOSTER WHEELER INDUSTRIAL
POWER COMPANY, INC.; AMEC
FOSTER WHEELER USA
CORPORATION; AMEC FOSTER
WHEELER NORTH AMERICA CORP.;
AND WOOD GROUP USA, INC.

Defendants.

Case No.

JURISDICTIONAL STATEMENT PURSUANT TO LOCAL RULE 87.2

Pursuant to Local Rule 87.2, Plaintiffs GRP-Madison, LLC; GRP-Franklin, LLC; and Georgia Renewable Power, LLC declare as follows:

1. Plaintiff GRP-Madison, LLC is a limited liability company that is a citizen of Florida. The sole member and 100% owner of GRP-Madison, LLC is GRP Borrower, LLC, a citizen of Florida. GRP HoldCo, LLC is the sole member and 100% owner of GRP Borrower, LLC and is a citizen of Florida. GRP Operating, LLC is the sole member and 100% owner of GRP HoldCo, LLC and is a citizen of Florida. Georgia Renewable Power, LLC is the sole member and 100% owner of GRP Operating, LLC and is a citizen of Florida. Greenfuels Energy, LLC is the sole member and 100% owner of Georgia Renewable Power, LLC and is a citizen of Florida.

Greenfuels Energy, LLC, a citizen of Florida, is 100% owned by Raymon Bean, an individual who is domiciled in Baker County, Florida and is a citizen of Florida.

2. Plaintiff GRP-Franklin, LLC is a limited liability company that is a citizen of Florida. The sole member and 100% owner of GRP-Franklin, LLC is GRP Borrower, LLC, a citizen of Florida. GRP HoldCo, LLC is the sole member and 100% owner of GRP Borrower, LLC and is a citizen of Florida. GRP Operating, LLC is the sole member and 100% owner of GRP HoldCo, LLC and is a citizen of Florida. Georgia Renewable Power, LLC is the sole member and 100% owner of GRP Operating, LLC and is a citizen of Florida. Greenfuels Energy, LLC is the sole member and 100% owner of Georgia Renewable Power, LLC and is a citizen of Florida. Greenfuels Energy, LLC, a citizen of Florida, is 100% owned by Raymon Bean, an individual who is domiciled in Baker County, Florida and is a citizen of Florida.

3. Plaintiff Georgia Renewable Power, LLC is a limited liability company and citizen of Florida. Greenfuels Energy, LLC is 100% owner and sole member of Georgia Renewable Power, LLC and is a citizen of Florida. Greenfuels Energy, LLC, a citizen of Florida, is 100% owned by Raymon Bean, an individual who is domiciled in Baker County, Florida and is a citizen of Florida.

Dated: November 6, 2023

Respectfully submitted,

/s/ J. Timothy McDonald
THOMPSON HINE LLP
J. Timothy McDonald
Tim.Mcdonald@thompsonhine.com
GA Bar No. 489420
Two Alliance Center
3560 Lenox Road NE, Suite 1600
Atlanta, GA 30326-4266
(404) 407-3623

GIBBONS, P.C.

*Peter J. Torcicollo

*Damian V. Santomauro

*Charles S. Korschun

*Andrew J. Marino

One Gateway Center

Newark, New Jersey 07102

(973) 596-4500

Attorneys for Plaintiffs

GRP-Madison, LLC; GRP-Franklin, LLC; and

Georgia Renewable Power, LLC

**pro hac vice applications pending*